

Exhibit D

Budget and Staffing Plan

Budget and Staffing Plan

(For Matter Categories for the Period Beginning on July 13, 2022 and Ending on November 9, 2023)

Budget

Matter Number	Matter Category Description	Hours Budgeted	Total Compensation Budgeted
2	Chapter 11 Bankruptcy Filing	650-700	\$650,000-\$700,000
3	Adversary Proceeding & Contested Matters	7,000 - 7,500	\$7,000,000.00-\$7,500,000.00
4	Automatic Stay Matters	750-1000	\$650,000.00-\$800,000.00
5	Business Operations	1,000 - 1,250	\$1,100,000.00-\$1,400,000.00
6	Case Administration	3,100 - 3,500	\$3,100,000-\$3,500,000
7	Cash Management and DIP Financing	500 – 650	\$550,000.00-\$650,000.00
8	Customer and Vendor Communications	1,250-1,350	\$1,200,000.00-\$1,300,000.00
9	Claims Administration and Objections	1,750-1,900	\$1,800,000.00-\$1,950,000.00
10	Official Committee Matters and Meetings	1,400 – 1,550	\$1,450,000.00-\$1,600,000.00
11	Use, Sale, and Disposition of Property	7,500-8,000	\$7,000,000.00-\$8,000,000.00
12	Corp., Governance, & Securities Matters	1,750-1,850	\$2,400,000-\$2,550,000
13	Employee Matters	1,800-1,950	\$2,050,000.00-\$2,150,000.00
14	Executory Contracts and Unexpired Leases	425-475	\$425,000.00-\$450,000.00
15	SOFAs and Schedules	800-900	\$900,000.00-\$1,000,000.00
16	Hearings	2,500-2,800	\$2,500,000.00-\$2,700,000.00
17	Insurance and Surety Matters	300-350	\$400,000.00-\$450,000.00
18	Disclosure Statement, Plan, Confirmation	12,000-13,000	\$14,000,000.00-\$15,000,000.00
19	International Issues	350-400	\$450,000.00-\$550,000.00
20	K&E Retention Matters	1,600-1,800	\$1,400,000-\$1,500,000

Matter Number	Matter Category Description	Hours Budgeted	Total Compensation Budgeted
21	Non-K&E Retention Matters	1,200-1,300	\$1,150,000-\$1,300,000
22	Tax Matters	730-760	\$900,000-\$1,050,000
23	Non-Working Travel	400-500	\$500,000-\$600,000
24	U.S. Trustee Communications & Reporting	500-600	\$600,000-\$700,000
26	Special Committee Matters	4,000-4,300	\$4,250,000-\$4,800,000
27	Stone Litigation	20-40	\$20,000-\$40,000
28	Prime Trust Litigation	10-30	\$10,000-\$30,000
29	Equities First Holdings Litigation	180-200	\$210,000-\$230,000
30	Stake Hound Litigation	20-30	\$25,000-\$35,000
31	Badger DAO Litigation	1-5	\$1,000-\$5,000
32	HDR Global Trading Litigation	0-5	\$500.00-\$3000.00
33	Reliz Limited Litigation	5-15	\$10,000.00-\$15,000.00
38	Blockchain Access UK Litigation	0-5	\$500-\$3000.00
39	Three Arrows Capital Litigation	0-10	\$500.00-\$5,000.00
41	Tether Limited Litigation	15-20	\$15,000.00-\$25,000.00
42	Core Scientific Litigation	1,500-1,750	\$1,500,000.00-\$1,750,000.00
43	Examiner Matters	2,000-2,250	\$2,000,000.00-\$2,500,000.00
44	GK8	1,500-1,750	\$1,500,000.00-\$1,750,000.00
45	Frishberg Litigation	100-125	\$100,000-\$125,000
46	Core Scientific, Chapter 11 Filing	600-700	\$700,000.00-\$800,000.00
47	Tiffany Fong Litigation	70-80	\$70,000.00-\$80,000.00
48	K&E Fee Matters	1,150-1,250	\$1,100,000.00-\$1,250,000.00
49	Non-K&E Fee Matters	200-250	\$200,000.00-\$250,000.00
50	Government and Regulatory Investigations	6,000-6,500	\$7,000,000.00-\$7,750,000.00
51	Appeals	200-250	\$150,000.00-\$250,000.00
TOTAL		66815-73655	\$71,037,500.00-\$79,096,000.00

Staffing Plan

Category of Timekeeper	Number of Timekeepers Expected to Work on the Matter Categories During the Budget Period	Average Hourly Rate¹
Partner	80-100	\$1,250-\$1,500
Counsel	1-5	\$1,100-\$1,300
Associate	130-150	\$800-\$1200
Total	215-260	\$1,050-\$1,333

¹ The Average Hourly Rate is a weighted average based on the individual hourly rate of, and projected number of hours worked by, each timekeeper over the course of the chapter 11 cases.